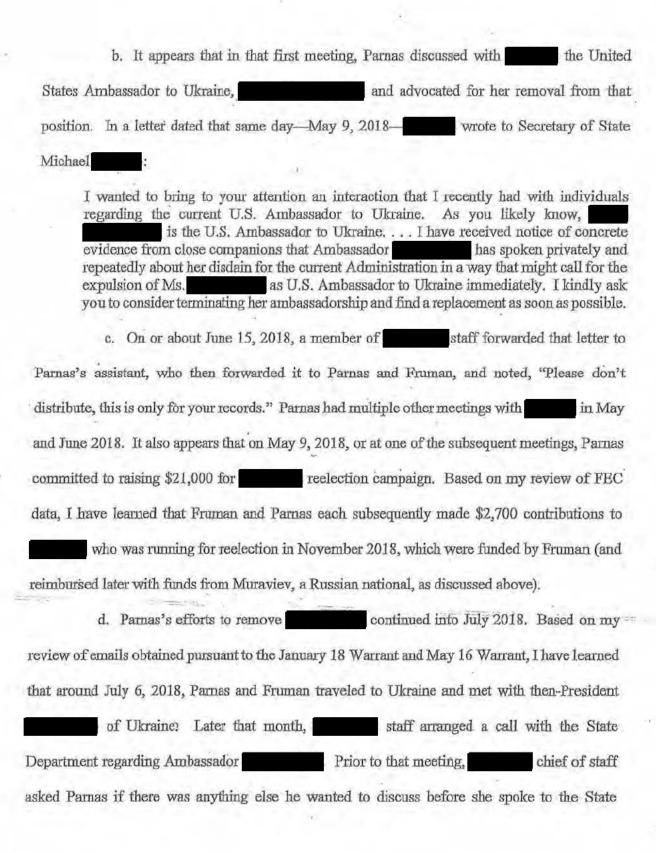
- 41. Based on my participation in the investigation to date, it appears that the initial request to remove originated in the spring of 2018. Based on my review of border crossing records, it appears that Parnas was in the United States in early 2018. Fruman, however, traveled to Ukraine in March, April, and May 2018. Around that same time period, Parnas and Fruman started attending political fundraising events and making contributions to congressional candidates and political action committees (including in the name of GEP) with the apparent purpose of enhancing their influence in circles, as discussed above.
- 42. Based on my participation in the investigation as well as my review of materials obtained pursuant to the January 18 Warrant and May 16 Warrant, I have learned that Parnas and Fruman appear to have used their newfound access to seek seemed as removal. Specifically, I have learned the following:
- a. During an April 20, 2018 roundtable at sponsored by the PAC, Parnas met then-Congressman (R-TX), and subsequently scheduled a meeting with for May 9, 2018. On May 9, 2018, in Washington, D.C., Parnas had the first of what would be multiple meetings with Fruman was in Ukraine at the time, and so Parnas sent him two photographs of the meeting: one depicted Parnas pointing at a map of Ukraine and Eastern Europe while looked on, and the other photo depicted posing with Parnas.

¹⁸ While the exact nature of Fruman's trips—and who he met with—is unknown, based on my review of materials obtained pursuant to the January 18 Warrant and May 16 Warrant, it appears that at least some of those trips were geared towards various business ventures. Based on my participation in the investigation, I have learned that Fruman appears to be an investor in a bar and restaurant in Ukraine, and previously invested in a milk company in Ukraine. Around this time, in the spring of 2018, based on my review of materials obtained pursuant to the May 16 Warrant, I have learned that Fruman began exchanging messages with Parnas regarding energy companies in Ukraine and Poland.



Department. Despite letter and subsequent efforts, Ambassador was not removed from her posting at that time.

- 43. After lobbying to remove did not on its own succeed, it appears that Parnas soon enlisted Rudolph Giuliani¹⁹ in his efforts to remove assertion. Based on my review of emails obtained pursuant to the January 18 Warrant and my review of public reporting, I have learned, among other things, the following:
- a. Parnas appeared to have met Giuliani at one of the fundraising events

 Parnas attended in the spring of 2018. In September 2018, Parnas retained Giuliani, through his

 consulting firm LLC, ostensibly to act as a consultant and spokesman for

 Parnas's fledgling insurance business, Fraud Guarantee. As part of that initial agreement, Giuliani

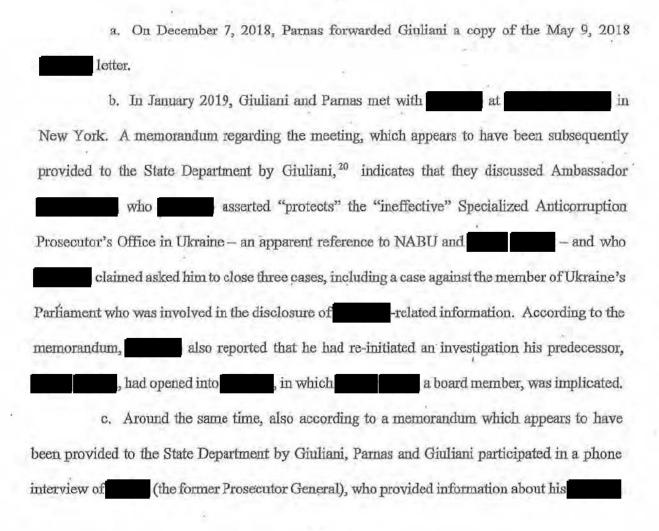
 requested a \$500,000 retainer and a total \$900,000 payment, of which at least the retainer appears

 to have been paid. However, based on my participation in the investigation and my review of

 materials obtained pursuant to the January 18 Warrant and May 16 Warrant, it appears that

 Giuliani's work for Parnas involved, in large part, assisting in the efforts to remove Ambassador
- 44. It appears that Giuliani's assistance on the Ambassador issue began in earnest in December 2018. Based on my review of public reporting and materials obtained pursuant to the January 18 Warrant and May 16 Warrant, I have learned, among other things, the following:

Based on my review of the January 18 Warrant, I have learned that while Giuliani is an attorney, the parties' contract includes a detailed description of the scope of work to be performed by none of which was legal in nature. To the contrary, the terms of the contract expressly state that is being retained "as a consultant" and describes a series of non-legal tasks to be completed in that capacity. Based on my participation in the investigation, aside from his statement that Fruman and Parnas were his "clients," described below, it does not appear that Giuliani was ever representing Fruman or Parnas as an attorney at any point.



²⁰ Based on my participation in the investigation, I have learned that according to a U.S. Department of State Office of Inspector General investigation, in late March or early April 2019, received a package that had to do with "Ukraine issues." The Secretary of State package had a return label of "The White House," although it bore no official seal, and contained notes from interviews between Parnas, Fruman, and Giuliani, among others, with dated January 23, 2019, regarding The documents were separated into folders that bore the insignia of the Trump Hotel. The notes from the meeting include his allegation about the "do not prosecute list," discussed below, and his explanation that the heads of SAPO and NABU "do not like each other" and that the head of NABU favored over Trump, and that spends money on "good public relations" for NABU. The package then contained March 20, 2019 articles (discussed along with documents that appeared to be below) featuring his interview with notes and emails regarding the articles. On October 2, 2019, Giuliani confirmed to that the package originated with him, and that he gave the documents to the White House, which then passed them to . Giuliani claimed that told him that would refer the documents for an investigation.

investigation and claimed that President had put an end to the investigation at the request of then-Vice-President

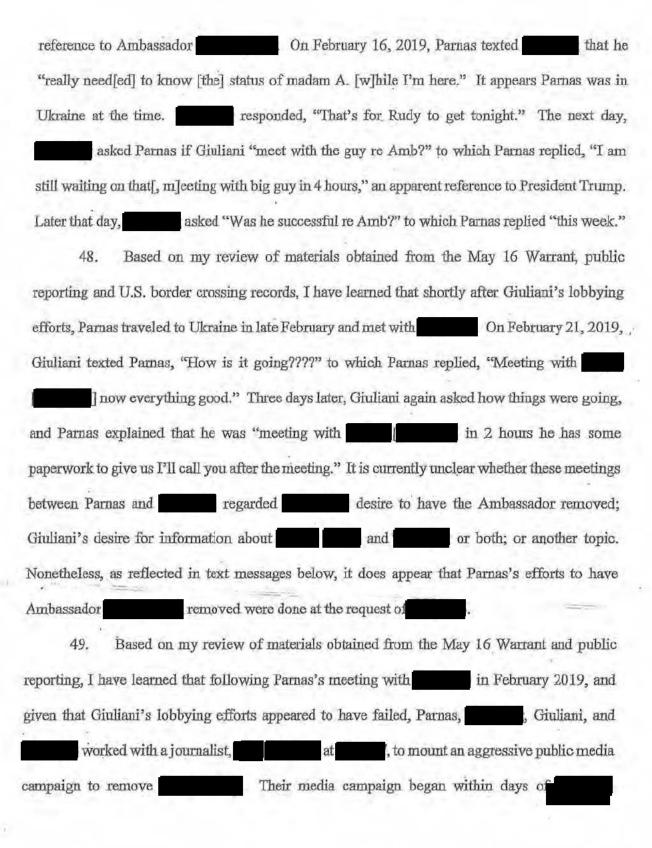
- Based on my review of U.S. border crossing records, materials obtained pursuant 45. to the May 16 Warrant, and public reporting, it appears that on February 11, 2019, Parnas and this time in Warsaw, Poland. Based on my review of materials Giuliani again met with obtained from the May 16 Warrant, I have learned that in February 2019, attorney and the spouse of former Washington D.C. United States Attorney appears to have become involved in the effort to remove Ambassador On multiple occasions, she asked Parnas if Giuliani had completed drafting a retainer agreement, noting in one instance that "[o]ur hands are pretty tied about doing much until we have it in place as we need it for FARA." Texts messages suggest that Giuliani was preparing a retainer agreement, and Parnas stated in one message that the retainer should be between and the Ministry of Justice of Ukraine (Attn:
- 46. Based on my review of materials obtained from the May 16 Warrant, I have learned that on or about February 16, 2019, Giuliani sent Parnas and Fruman a draft retainer agreement between as the General Prosecutor of Ukraine," and and The retainer amount was \$200,000 for services by Giuliani, and in recovering "sums of money in various financial institutions outside Ukraine." It is not clear what this phrase refers to, and may simply have been an effort to legitimize, or give the

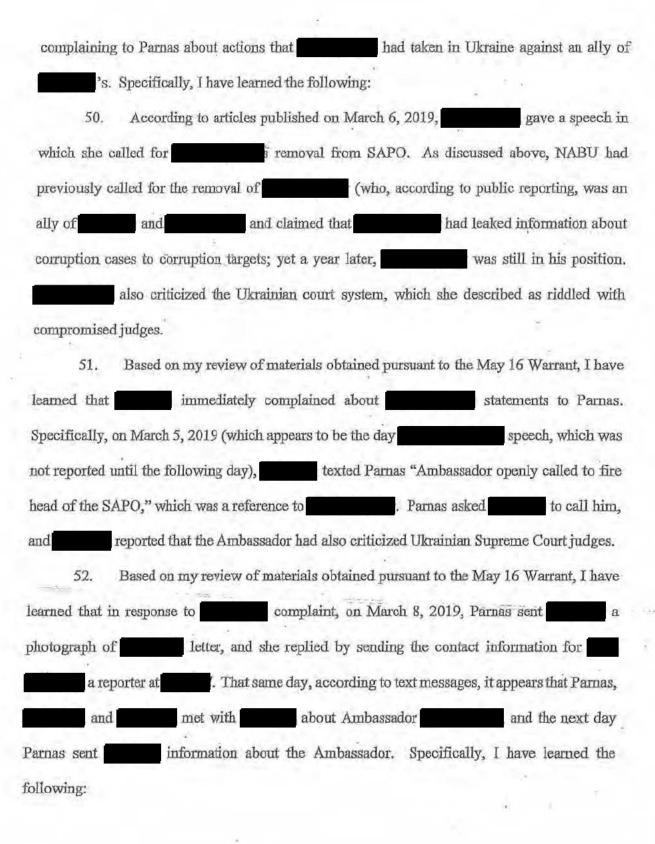
Based on my review of materials obtained pursuant to the May 16 Warrant, it is not clear whether Parnas or Giuliani forwarded a copy of the February 2019 draft retainer agreement to Around that time, repeatedly asked Parnas what the status of the retainer agreement was, and asked him to forward her a copy. Parnas responded that he was trying but it was not going through, although it is not clear whether Parnas ultimately succeeded in forwarding the draft retainer to

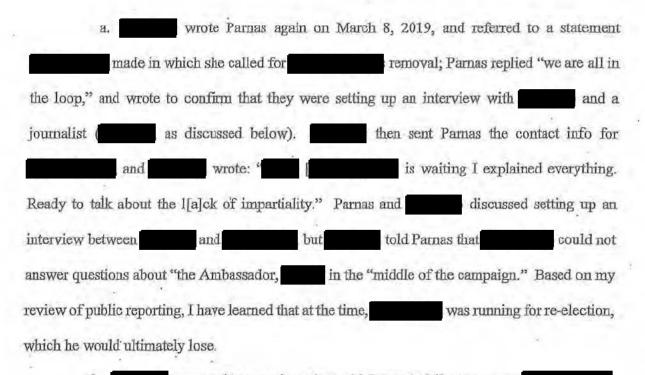
appearance of legitimacy to, what were in truth their efforts to remove the U.S. ambassador to Ukraine. The agreement also stated that it was a temporary agreement to be superseded "by a long term agreement." On February 20, 2019, Parnas asked Giuliani to send wire instructions and a so they can execute and wire funds." Later that day, Parnas "signed copy by you confirmed that he "received signed retainer," however, we have not obtained a copy of the signed retainer. As discussed below, drafts of three long-form retainer agreements between 22 and (iii) separately - all and (i) and of which were signed by - were subsequently circulated in April 2019. Based on my review of Department of Justice records related to FARA filings, I have learned that none of Parnas, Fruman, Giuliani, registered under FARA at any point in 2018 or 2019.

47. Based on my review of materials obtained from the May 16 Warrant, I have learned that after Giuliani received payments from Parnas, Giuliani appeared to have privately lobbied high-level officials—including, apparently, Secretary of State and President Trump—for On February 11, 2019, the same day that Giuliani and the removal of Ambassador asked Parnas and Giuliani in a text message "Is there absolute Parnas met with commitment for HER to be gone this week?" Giuliani replied, "Yes not sufre how absolute [w]ill is now aware of it. Talked to him on Friday." get a reading in morning and call you. On February 14, 2019, asked Parnas if he had heard from Giuliani, and Parnas said he to "nudge [Giuliani] about the Mrs. A.," which appears to be a had, and encouraged

Based on my review of publicly available material, I have learned that worked under at that time as the deputy head of International Legal Cooperation. According to an article published on October 5, 2019 in the remove at a meeting in 2016 due to a scorruption.







appeared to grow impatient with Parnas's failure to secure
removal. On March 11, 2019, asked Parnas when he would be receiving an invitation
from the "General Attorney," which appears to be a reference to the U.S. Attorney General. On
March 13, 2019, wrote Parnas "I am fucking sick of everything. I did not get the visit.
My First did not get shit. I am ready to screw your opponents. But you want even more. We –
everything. You – later. This is not fair." Based on my participation in the investigation, this
appears to be a reference to and others' willingness to share information about
and and frustration that Parnas could not similarly deliver on issues to include the
removal of Ambassador and meeting with the Attorney General. On March 14, 2019,
Parnas responded "I just spoke with our [people]. I think there is good news. When you get a
chance, call me regarding your visit here." Based on my participation in the investigation, it
appears that "our people" refers to Giuliani and/or

